

HONORABLE RICHARD A. JONES

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

“Amy” and “Vicky”,

Plaintiffs,

v.

Joshua Osmun Kennedy,

Defendant.

CONSOLIDATED
LEAD CASE NO. C13-17 RAJ
MEMBER CASE NO. C13-762 RAJ

**DECLARATION OF JENNIFER
FREEMAN IN SUPPORT OF
PLAINTIFFS’ MOTION FOR
PARTIAL SUMMARY JUDGMENT**

NOTE ON MOTION CALENDAR:
August 29, 2014

WITHOUT ORAL ARGUMENT

Jennifer Freeman, duly sworn, deposes and says,

1. I am an attorney admitted to practice law in the State of New York and admitted *pro hac vice* to this Court. I submit this Declaration in support of Plaintiff Amy and Vicky’s motion for partial summary judgment in this case.

Declaration of Jennifer Freeman in support of
Plaintiffs’ Motion for Partial Summary Judgment - 1

**LAW OFFICE OF
JO-HANNA READ**
2200 Sixth Ave., #1250
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(206) 441-1980
(206) 441-5803 Fax

1 2. Attached as Exhibit 1 is the Indictment of the individual who initially sexually abused
2 Amy, photographed that abuse and distributed it. The Indictment has been redacted to protect
3 Amy's identity.

4 3. Attached as Exhibit 2 is a true and correct copy of the plea agreement of the defendant
5 whose indictment is attached as Exhibit 1. The plea agreement has been redacted to protect
6 Amy's identity.

7 4. Attached as Exhibit 3 is a true and correct copy of the forensic psychological report
8 submitted by Joyanna Silberg PhD. in connect with Amy's Restitution Request.

9 5. Attached as Exhibit 4 is a true and correct copy of excerpts from the transcript of Mr.
10 Kennedy's criminal trial.

11 6. Attached as Exhibit 5 are true and correct copies of (a) the subpoena dated July 1, 2014
12 that I issued to the National Center for Missing and Exploited Children ("NCMEC") and (b)
13 NCMEC's response to the subpoena. The subpoena sought that portion of NCMEC's Child
14 Victim Identification Program report regarding Mr. Kennedy and Amy's child sex abuse images,
15 known as the Misty Series. *See United States v. Kennedy*, 643 F.3d 1251, 1254 n. 8 (9th Cir.
16 2011) ("The Child Victim Identification Program at the National Center for Missing & Exploited
17 Children ("NCMEC") assists law enforcement in identifying the victims of child pornography.
18 When a law enforcement agency submits copies of seized images, NCMEC returns a report
19 identifying the child victims depicted in them."); <http://www.missingkids.com/CVIP>.

20 7. Attached as Exhibit 6 is a true and correct copy of a letter Mr. Kennedy submitted to this
21 Court in connection with his sentencing.

22 8. Attached as Exhibit 7 is a true and correct copy of excerpts from the transcript of Mr.
23 Kennedy's sentencing.

Declaration of Jennifer Freeman in support of
Plaintiffs' Motion for Partial Summary Judgment - 2

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